

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

DOCKET NO. 2021-89-E  
DOCKET NO. 2021-90-E

In the Matter of:	)	
	)	
Duke Energy Carolinas, LLC's and Duke	)	<b>STIPULATION TESTIMONY OF</b>
Energy Progress LLC's 2021 Avoided Cost	)	<b>GLEN A. SNIDER</b>
Proceeding Pursuant to S.C. Code Ann.	)	<b>ON BEHALF OF DUKE ENERGY</b>
Section 58-41-20(A)	)	<b>CAROLINAS, LLC AND DUKE</b>
	)	<b>ENERGY PROGRESS, LLC</b>
	)	

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1   **Q.   PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT**  
2       **POSITION.**

3   A.   My name is Glen A. Snider. My business address is 526 South Church Street,  
4       Charlotte, North Carolina 28202. I am currently employed by Duke Energy as  
5       Director of Carolinas Integrated Resource Planning and Analytics.

6   **Q.   DID YOU PREVIOUSLY FILE DIRECT TESTIMONY IN SUPPORT OF**  
7       **THE JOINT APPLICATION IN THIS PROCEEDING?**

8   A.   Yes, I did.

9   **Q.   DID YOU ALSO PREVIOUSLY FILE LIMITED REBUTTAL**  
10       **TESTIMONY IN THIS PROCEEDING?**

11   A.   Yes. My limited rebuttal testimony responded to testimony filed on behalf of  
12       Pelzer Hydro Company, LLC and Aquenergy Systems, LLC and Northbrook  
13       Carolina Hydro, LLC (“Hydro QF Advocates”).

14   **Q.   WHAT IS THE PURPOSE OF YOUR STIPULATION TESTIMONY IN**  
15       **THIS PROCEEDING?**

16   A.   The purpose of my testimony is to support certain provisions of the Stipulation of  
17       Agreement between Duke Energy Carolinas, LLC (“DEC”) and Duke Energy  
18       Progress, LLC (“DEP”) (together, the “Companies”); the South Carolina Office of  
19       Regulatory Staff (“ORS”); Carolinas Clean Energy Business Association  
20       (“CCEBA”); and South Carolina Coastal Conservation League and Southern  
21       Alliance for Clean Energy (together, the “Environmental Parties”) (collectively,  
22       the “Stipulating Parties”) (“Stipulation” or “Stipulation Agreement”). In

1 particular, I sponsor the avoided cost methodology and rate calculation aspect of  
2 the Stipulation Agreement.

3 **Q. PLEASE SUMMARIZE THE COMPROMISES REFLECTED IN THE**  
4 **STIPULATION.**

5 A. Consistent with the Companies' Joint Application and the supportive testimony of  
6 ORS Witnesses Gretchen C. Pool and Brian Horii, the Stipulating Parties agree to  
7 and recommend the Commission approve the Companies' proposed avoided cost  
8 methodology and calculation of avoided energy and avoided capacity rates for  
9 DEP. For DEC, the Stipulating Parties agree to and recommend the Commission  
10 approve the Companies' avoided cost methodology and avoided energy rates.  
11 The Stipulating Parties support one adjustment to DEC's avoided capacity rates to  
12 adopt the position presented by ORS Witness Horii on the seasonal allocation of  
13 capacity value.

14 **Q. PLEASE DESCRIBE THE SEASONAL ALLOCATION OF CAPACITY**  
15 **VALUE ADJUSTMENT FOR DEC SUPPORTED IN THE STIPULATION.**

16 A. As described in the Companies' Joint Application and in my Direct Testimony,<sup>1</sup>  
17 the Companies incorporate a seasonal weighting in their avoided capacity cost  
18 calculations to appropriately recognize the season of the year that drives the  
19 Companies' reliability need for new capacity additions. For DEC and DEP, the  
20 seasonal allocation is heavily weighted to winter based on the impact of summer  
21 versus winter loss of load risk, which has been driven by the volatility in winter  
22 peak demand, as well as the growing penetration of solar resources and its  
23 associated impact on summer versus winter reserves.

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<sup>1</sup> DEC/DEP Joint Application, at 14; DEC/DEP Snider Direct, at 22-23.

1 In developing these seasonal weightings, the Companies used the 2018  
2 Solar Capacity Value Study since the current level of solar closely aligns with the  
3 DEC Tranche 2 solar assumptions (2,300 MW) from that study. Based on the  
4 2018 study, DEC's seasonal allocation is 89% winter and 11% summer. Thus,  
5 DEC's proposed avoided capacity rates pay 89% of the annual capacity value in  
6 the winter and the remaining 11% in the summer period.

7 ORS Witness Horii's Direct Testimony recommended that DEC's  
8 proposed allocation should be adjusted to 95% winter and 5% summer based on  
9 results from the DEC 2020 Resource Adequacy Study and to better align with the  
10 current levels of solar on the DEC system.<sup>2</sup> The Stipulating Parties agree to ORS  
11 Witness Horii's recommended adjustment for purposes of calculating DEC's  
12 avoided capacity cost rates in this proceeding.

13 **Q. IN YOUR VIEW, DOES THE STIPULATION REACHED BY THE**  
14 **STIPULATING PARTIES RESULT IN AVOIDED ENERGY AND**  
15 **AVOIDED CAPACITY RATES FOR BOTH DEC AND DEP THAT ARE**  
16 **REASONABLE AND CONSISTENT WITH THE REQUIREMENTS OF**  
17 **PURPA AND ACT 62?**

18 **A.** Yes. I believe the Stipulation represents a just and reasonable resolution of the  
19 issues in this proceeding and results in avoided energy and avoided capacity rates  
20 that are reasonable and consistent with the requirements of PURPA and Act 62.  
21 The Companies request the Commission approve the initially proposed avoided  
22 cost rates for DEP as reflected in DEC/DEP Witness Johnson's DEP Direct  
23 Exhibits. DEC/DEP Witness David Johnson's Stipulation Testimony sponsors

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<sup>2</sup> ORS Horii Direct, at 11.

1 DEC's updated Standard Offer and Large QF tariffs to effectuate the adjustment  
2 to DEC's avoided capacity rates supported by the Stipulating Parties.

3 **Q. DOES THIS CONCLUDE YOUR PRE-FILED STIPULATION**  
4 **TESTIMONY?**

5 A. Yes.